

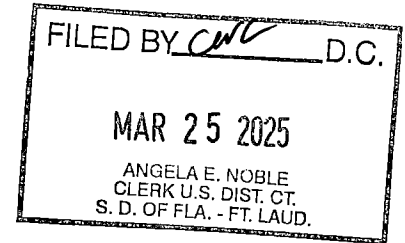
**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

KENNY ALEXANDRE
Plaintiff,

v.

COLUMBIA DEBT RECOVERY LLC
Defendant

) **JURY TRIAL DEMANDED**
)
)
) **Case No.**
)
)
)
)



COMPLAINT AND DEMAND FOR JURY TRIAL

I. INTRODUCTION

1. This is an action for actual and statutory damages brought by Plaintiff Kenny Alexandre, an individual consumer, against Defendant ~~Mutual Management Services, LLC~~ ^{K.A. COLUMBIA DEBT RECOVERY LLC} for violations of the Fair Debt Collection Practices Act, 15 U.S.C § 1692 *et seq.* (hereinafter "FDCPA"), which prohibits debt collectors from engaging in abusive, deceptive and unfair practices.

II. JURISDICTION AND VENUE

2. Jurisdiction of this court arises under 15 U.S.C § 1692k(d) 28 U.S.C 1331.

Venue in this District is proper in that the Defendant transacts business in Miami ~~located in Miami, Florida~~ ^{Broward, F} and the conduct complained of occurred in ~~Miami, Florida~~ ^{Broward}.

SCANNED

III. PARTIES

3. Plaintiff Kenny Alexandre (hereinafter “Plaintiff”, Mr. Alexandre) is a natural person residing in Sunrise, FL. Plaintiff is a consumer as defined by the Fair Debt Collection Practices Act, 15 U.S.C. §1692a(3).
4. Plaintiff alleged “debt” as defined by the FDCPA, 15 U.S.C 1692a(5) arose from a transaction entered into primarily for personal use.
5. Upon information and belief, Columbia Debt Recovery, LLC, is a Washington corporation with its principal place of business located at 906 SE Everett Mall Way, Suite 301, Everett, WA 98208.
6. Defendant is engaged in the collection of debt from consumers using the mail and telephone. Defendant regularly attempts to collect consumers’ debts alleged to be due to another.

IV. FACTS OF THE COMPLAINT

7. Defendant Columbia Debt Recovery, LLC, (hereinafter referred to as “Debt Collector”) is a “debt collector” as defined by the FDCPA, 15 U.S.C 1692a(6).

8. On or about October 16, 2024, Mr. Alexandre mailed a dispute letter via USPS certified mail to Columbia Debt Recovery, LLC disputing an allegedly debt owed to Casa Bella On Westshore in the amount of \$2,831.
9. The Tracking Number for this mailing is 7022 1670 0003 3103 4218.
10. On or about October 28, 2024 at 11:03 am, Plaintiff received notice from USPS that his letter was received by an individual at the Debt Collector's principal address.
11. As is Plaintiff's right under the FDCPA and 15 USC 1692 C (C), the letter stated that he refuse to pay the debt.
12. Despite these clear instructions, in an attempt to intimidate, harass, and oppress Mr. Alexandre, the Debt Collector communicated by email. On January 30, 2025, Mr. Alexandre received a letter from Columbia Debt Recovery, LLC in response to his dispute letter which was a communication about the debt and was an attempt to collect the debt.
13. This was sent to confuse, harass, and deceive Plaintiff.
14. Mr. Alexandre has suffered actual damages as a result of these illegal collection tactics by this Debt Collector in the form of invasion of privacy, personal

embarrassment, loss of productive time, emotional distress, frustration, anger, humiliation and amongst other negative emotions.

15. Columbia Debt Recovery, LLC. violated 15 U.S.C 1692c(c) for communicating with the Plaintiff attempting to collect a debt.

**V. FIRST CLAIM FOR RELIEF
(Columbia Debt Recovery, LLC)
15 U.S.C 1692c(c)**

16. Plaintiff re-alleges and reincorporates all previous paragraphs as if fully set out herein.
17. The Debt Collector violated the FDCPA.
18. The Debt Collector's violations include, but are not limited to, the following:
 - (a) The Debt Collector violated 15 U.S.C § 1692c(c) of the FDCPA by failing to cease collection after receiving written notice.
19. As a result of the above violations of the FDCPA, Defendant, Debt Collector, is liable to Plaintiff, Mr. Alexandre, for actual damages, statutory damages, and costs.

VI. JURY DEMAND AND PRAYER FOR RELIEF

WHEREFORE, Plaintiff, Kenny Alexandre respectfully demands a jury trial and requests that judgment be entered in favor of Plaintiff and against the Debt Collector for:

- A. Judgment for the violations occurred for violating the FDCPA;
- B. Actual damages pursuant to 15 U.S.C 1692k(1)(2);
- C. Statutory damages pursuant to 15 U.S.C 1692k(2);
- D. Cost pursuant to 15 U.S.C 1692k(3);
- E. For such other and further relief as the Court may deem just and proper.

Respectfully submitted:



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